



3. At the presentment on December 3, 2019, defense counsel consented to a waiver of his client's right, pursuant to Rule 5.1 of the Federal Rules of Criminal Procedure, to a preliminary hearing within 21 days of the initial appearance. Accordingly, under the Speedy Trial Act the Government initially had until January 2, 2020 within which to file an indictment or information.

4. Defense counsel and I have had discussions regarding a possible disposition of this case beginning on December 11, 2019. The negotiations have not been completed and we plan to continue our discussions, but do not anticipate a resolution before the deadline under the Speedy Trial Act expires on January 2, 2020.

5. Therefore, the Government is requesting a 30-day continuance, until February 3, 2020, to continue the foregoing discussions and reach a disposition of this matter. On December 11, 2019, I personally spoke to defense counsel who specifically consented to this request.

6. For the reasons stated above, the ends of justice served by the granting of the requested continuance outweigh the best interests of the public and defendant in a speedy trial.

Dated: New York, New York  
December 30, 2019



Rushmi Bhaskaran  
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